

July 15, 2014

Via Electronic Mail: objections-pnw-regional-office@fs.fed.us

United States Forest Service
Portland Regional Office
Objection Reviewing Officer
Attn: Objections
PO Box 3623
Portland, OR 97294

**RE: Objections to Draft Decision Notice/FONSI
Antelope Grazing Allotments Project, Fremont-Winema National Forest**

Dear Objection Reviewing Officer:

Iverson Management Limited Partnership ("Iverson") objects as set out below to certain provisions in the May 2014 Draft Decision Notice/FONSI for the Antelope Grazing Allotments Project Decision ("Proposed Decision"). Overall, Iverson finds the Proposed Decision to be reasonable and responsive to the many comments received. We appreciate the time and effort put into the Proposed Decision to date and look forward to working with the U.S. Forest Service to resolve our remaining objections.

Lead Objector

Keith Little, Ranch Manager
Iverson Management Limited Partnership
PO Box 97
Silver Lake, Oregon 97638
541-420-0831

Project Information

Name: Fremont-Winema National Forest Antelope Grazing Allotments Project
Responsible Official: Constance Cummins, Forest Supervisor Fremont-Winema National Forest
Affected Ranger Districts: Chemult and Silver Lake Ranger Districts
Affected National Forest: Fremont-Winema National Forest

Objections

Iverson submitted comments on November 25, 2010 and January 17, 2014. Copies are attached.

Iverson objects to the Proposed Decision as follows:

1. Iverson objects to the Proposed Decision in that it fails to include Iverson in fence location or construction decisions and fails to propose a cost share as requested in Iverson's November 25, 2010 and January 17, 2014 comments. Further, Iverson objects to the Proposed Decision in that it outlines specific details for fence construction and maintenance. The final decision should simply require that fences be constructed in accordance with the Interagency Fence Guidelines. This will allow the Forest Service and permittee to make reasonable, on-the-ground decisions about how fences will be constructed. Iverson supports the Proposed Decision's incremental approach to fence construction, but objects to the fact that the same approach is not applied to fence maintenance. To the extent the Forest Service wants the permittee to conduct low impact fence maintenance, it must provide sufficient time for Iverson to do the work. The Proposed Decision does not adequately account for the number of fences to be maintained around and throughout the project area.
2. Iverson objects to the Proposed Decision's approach to exclosure fences. Iverson appreciates the Forest Service's decision to itself construct, reconstruct, and maintain exclosure fences. However, the Proposed Decision does not account or plan for how the Forest Service will maintain the number of fences it proposes. It also does not address impacts to forage availability from the exclosures, many of which are in important, high value forage areas, or the potential for livestock to impact resources adjacent exclosure fences when they are built, particularly where they exclose forage or water historically utilized by livestock. In its November 25, 2010 and January 17, 2014 comments, Iverson noted the costs of exclosures and benefit to the Forest Service of removing maintenance obligations for a number of exclosures. Iverson's comments also supported Alternative 3, which had significantly fewer exclosures than the Proposed Decision.
3. Iverson objects to the Proposed Decision's water structure plans. The Proposed Decision fails to propose a cost share agreement with Iverson for the numerous water structure proposals, including new construction and the transition of an unidentified number of water structures to the grazing permit as range improvements. The extensive list of new/reconstructed structures and the addition of unspecified water structures as range improvements was not part of the proposed Alternative 3, which Iverson supported in its January 17, 2014 comments. Further, the Forest Service did not consult or cooperate with Iverson prior to issuing the Proposed Decision or to determine when and where to modify, reconstruct or install new water structures. Iverson specifically requested, in its 2010 and 2014 comments, that the Forest Service meet and work with it in developing the water structure plan. As it stands, the Proposed Decision is unclear and likely inconsistent with Iverson's needs. The Proposed Decision also does not address Iverson's request in its January 17, 2014 comments that the Forest Service share costs on all new construction.
4. The Proposed Decision proposes to manage Jack Creek Riparian Pasture as set out in the Jack Creek Oregon Spotted Frog Site Management Plan ("Site Plan"). This proposal is somewhat consistent with Iverson's comments, which requested that the Riparian Pasture

be managed consistent with the Site Plan. However, the Proposed Decision diverges from the Site Plan in significant ways. Iverson objects to the following divergences from the Site Plan and to the Proposed Decision as follows:

- a. The Site Plan does not call for four separate pastures or rotational grazing between those pastures in Jack Creek Riparian Pasture. Iverson supports a grazing rotation between private and public parcels, but objects to fencing the pasture into four separate sub-pastures.
 - b. The Site Plan does not call for rest of any portion of the Jack Creek Riparian Pasture until an off-channel water facility is developed. Further, grazing is characterized as a “helpful tool in achieving habitat goals provided the cattle are properly handled.” Iverson objects to the proposal to rest the entire pasture from grazing indefinitely (i.e. until the Forest Service has funds for an off-channel water facility). Particularly with the potential listing of the Oregon Spotted Frog (“OSF”), grazing is an important tool that should be used to improve critical habitat and OSF numbers in this area.
 - c. Iverson objects to failure to include the Jack Creek Riparian Pasture AUMs in its grazing permit. The public lands and private lands in the Riparian Pasture will be grazed. The permit should reflect this fact, as requested in Iverson’s November 2010 and January 2014 comments.
 - d. Iverson objects to the reduction of the grazing period by half a month, from 3.5 to 3 months, in the Riparian Pasture. This reduction is not supported by existing literature, information about the Riparian Pasture, or the Site Plan.
 - e. Iverson objects to imposition of the automatic range readiness requirement onto the Jack Creek Riparian Pasture. The Site Plan suggests that earlier grazing may be appropriate and this option should not be excluded by the Proposed Decision.
5. Iverson’s comments supported Alternative 3 of the Draft Environmental Assessment. Iverson’s comments further stated that it must be able to maintain its operations at the current level. The Proposed Decision is inconsistent with both of these comments as it diverges from with the Fremont-Winema Forest Plan’s Soil and Water Standards and Guidelines. More specifically, the Proposed Decision indicates that livestock will be removed from the vicinity of a fen and from an entire pasture if the fen or a certain number of fens have more than 10% bare soil across one or each of the 3-5 fens (depending on the circumstances). The Fremont-Winema Forest Plan states that “The cumulative total area of detrimental soil conditions in riparian areas shall not exceed 10 percent of the *total riparian acreage within an activity area*.” Further, the Forest Plan does not have a specific requirement for fens which could be applied in to the activity area. The requirement to remove livestock from the vicinity of a fen or a pasture based on conditions in one or a few fens is inconsistent with the Forest Plan and with the Iverson’s comments supporting draft Alternative 3.
6. In its November 25, 2010 comments, Iverson proposed a particular rotation. In its January 17, 2014 comments, Iverson indicated that Alternative 3 would be an acceptable decision. In neither instance did Iverson indicate that it could maintain a rotation that required livestock to remain north or south of Road 94 without an actual barrier in place.

This is infeasible. Iverson objects to the Proposed Decision's proposed rotation for this reason. Livestock can and will move from one end of the Chemult Pasture to the other in a day. Road 94 is not a barrier to livestock and Iverson cannot ride the Chemult Pasture often or frequently enough to maintain livestock north or south of Road 94.

7. With regards to the Finding of No Significant Impact ("FONSI"), the Forest Service concludes that no effects are highly controversial and that no effects are highly uncertain or involve unknown risks. Iverson does not necessarily disagree with these findings, but notes that the agency's decision to authorize grazing on the Antelope Allotment, Chemult Pasture, has been challenged multiple times. Recently, that litigation focused on the litigants' position that there is uncertainty and controversy regarding the effects of livestock grazing on the allotment. Though Iverson disagreed with the litigants' position and the litigants were not successful in obtaining a preliminary injunction, to the extent that issuing an Environmental Impact Statement ("EIS") will reduce litigation risk and will not unduly extend the time to issue a final decision, Iverson supports issuance of an EIS prior to issuance of a final decision.

Remedies

Iverson proposed the following remedies to its objections:

1. Revise the Proposed Decision to require consultation and coordination with Iverson on fence locations and construction/reconstruction standards. Remove specific direction for fence maintenance standards and confirm the Forest Service's ability to be flexible on the ground with regards to the timing and approach to fence maintenance.
2. Commit the Forest Service to hiring a fence construction and maintenance crew to annually build/rebuild/maintain exclosures within the project area. Commit to consultation and coordinate with Iverson as to the location of all exclosure fences. Agree to minimize the impacts of exclosure fences on forage and water availability. Further, agree to work with Iverson to select fence locations that will minimize livestock impacts to areas adjacent to exclosures.
3. Consult with Iverson as to the location of proposed water structures and determination of which structures will be incorporated into the grazing permit as range improvements. Agree to cost share all water structure developments and improvements, i.e. all new construction.
4. Revise the Proposed Decision to manage the Jack Creek Riparian Pasture as set out in the Jack Creek Oregon Spotted Frog Management Plan. Revise the proposed rotation. Remove rest requirements and other restrictions on grazing that were not part of and that are inconsistent with the Plan. Incorporate the pasture's AUMs into Iverson's grazing permit. Return the grazing season to 3.5 months. Modify the range readiness requirements to reflect the fact that early season grazing can be appropriate and beneficial.

5. Revise the Proposed Decision to be consistent with the Fremont-Winema Forest Plan. Specifically, the Proposed Decision should be no more restrictive than the requirement to prevent detrimental soil conditions of 10% across the total riparian acreage within the project area.
6. Revise the rotation proposal, specifically remove the requirement that livestock be restrained to different sides of Road 94.
7. Prepare an EIS should the Forest Service decide doing so is appropriate.

Meeting

Iverson requests a meeting prior to the reviewing officer's written response to discuss the objections raised and a resolution of the same.

Iverson also asks to be notified of and allowed to participate in any meeting with any other objectors as allowed by 36 CFR 218.11(a).

Sincerely,

 7-15-14

Keith Little, Ranch Manager
Iverson Management Limited Partnership

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**Iverson Management Limited Partnership
P.O. Box 97
Silver Lake, OR 97638**

November 25, 2010

Mrs. Barbara Machado
PO Box 67
Paisley, OR 97636

Dear Mrs. Machado,

This letter is in response to the Antelope Grazing Allotments Project Proposal & Public Scoping Document. We have no comments on the scoping letter until Section IV. Need for Action. We would like to begin by addressing the last bullet of the section. In order to maintain our operations at the current level, Iverson Management Limited Partnership must continue to graze the Antelope Allotments. Without these allotments, the business would be forced to down size, resulting in a decrease to the local employment and local economy.

Under Section V. Proposed Action, we agree that livestock grazing, using adaptive management flexibility, should continue to meet the 6 bullets items the proposed action is designed to achieve. Under the ***Allotment Boundary***, we approve of the proposed boundary change around the Cannon Well area and the northern border of the Tobin Cabin pasture as stated in the scoping document. Under the ***Pastures*** section, we approve of the proposed boundary change on the west side of Tobin Cabin (Rock Springs). However, we only agree to these proposed boundary changes mentioned above if the boundary fences are constructed to standard. Please see below for a discussion concerning each individual riparian pasture and/or exclosures.

Dry Meadow: Within the Dry Meadow exclosure, a natural spring exists. However, the size of the exclosure appears to extreme in size. In my opinion, the fence materials will deteriorate to the point where the fence becomes ineffective within the time frame of this AMP. Instead of rebuilding the fence in its current location, we would like to request a new look be taken at the size of the exclosure so only the sensitive resources are excluded. As for the water development that exists at Dry Meadow, we agree with Mike Nevill, Range Management Specialist for the Antelope Allotment, that there should be a second tank installed in coordination with the first tank system to increase water storage for this area. In addition, we agree with Mike's recommendation to tie an existing second spring box in with the existing system to increase the supply of water available for livestock consumption.

Rider's Camp: Within the Rider's Camp exclosure, the only water is ground water within natural ponds (no natural springs exist). To my knowledge, no sensitive resources have been identified within this exclosure. Like Dry Meadow, the fence will become ineffective within the time frame of this AMP. Before the fence is reconstructed, we would like to request all

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specialists take a look at this area to see if the fence is necessary for protection of sensitive resources. We strongly feel this fence can be removed and the area incorporated into the grazing strategy for the surrounding area. As for the water sources, the natural ponds could be protected by hard-facing the access points used by the cattle (crushed rock, etc.). This recommendation was made by Desi Zamudio, previous Forest Soils Specialist, before the enclosure was constructed.

Cannon Well: Within the Cannon Well enclosure, the only water is ground water from man-created ponds (no natural springs exist). These ponds were dug when the land was privately owned. To our knowledge, there are no sensitive resources within this area. Management of this area can be utilized without a fence in our propose grazing rotation described below. From an economic standpoint, removing the Cannon Well fence would serve two purposes. One, the cost to the Forest Service for maintaining the fence would be eliminated. Second, the materials could be utilized in the proposed fence reconstruction or new fence construction to the east.

Squirrel Camp: Within the Squirrel Camp enclosure, there is a natural spring. Again, we believe the size of this enclosure needs to be reevaluated when the fence becomes ineffective within the timeframe of this AMP (the northern portion of this fence was constructed with thinning slash instead of proper fencing materials). We believe an enclosure around the spring (and any other special resources) would be adequate for this area.

Round Meadow: Based on discussions and reports from various specialists, we believe Round Meadow should not be a separate pasture for the following reasons. First, the fence around Round Meadow will becomes ineffective within the time frame of this AMP. Before grazing can occur within Round Meadow, there would be enclosures put up around the springs, fens, and possible the cabin for cultural resource protection. With our proposed grazing strategy proposed below, we believe Round Meadow can be managed without an external fence, saving the Forest Service reconstruction expenses.

Jack Creek Riparian Pasture: After further conversations with specialists, we agree that Jack Creek can be grazed on a rotation system between our private lands (Jamison Place) and Forest Service lands. Since the capacity of the Jamison Place has never been included within the number of cow/calf pairs on the allotment, this pasture will be operated as a separate herd.

We feel by reducing and/or eliminated the enclosures of the six areas described above, we could begin to get back to achieving better overall utilization standards on the Antelope Cattle and Horse Allotment (Winema NF).

Sproats, Wilshire, and Johnson's Meadow: Our primary concern with these enclosures is the fences that will become ineffective within the time frame of this AMP. Instead of rebuilding the fence in its current location, we would like to request a new look be taken at the size of the enclosure so only the sensitive resources are excluded. At the period in time a new fence construction/reconstruction occurs, we request to be involved in the process to better facilitate livestock management. As previously stated in the Dry Meadow section above, additional storage tanks and storage boxes need to be incorporated into these three systems.

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In the *Fence Construction* Section, we request fences are constructed/reconstructed to a standard and use low-maintenance materials (i.e. railroad ties for braces instead of treated lodgepole pine posts). Also no metal stays be put on the newly constructed/reconstructed fences because snow load and blow down damage the stays making maintenance of the fences more time consuming and costly.

As discussed in the *Water Structures* section, we agree there are many water structures that need improved and well as development of new water sources for better livestock dispersal. Throughout the EA process, we would like to meet with the IDT to discuss the plan for each water source in detail.

We believe the proposed deferred rotation system can be accomplished, as stated under *Grazing Strategies*, but we propose a different permitted grazing table from the scoping document.

We have thought about the proposed grazing schedule show in the *Permitted Grazing* section. We understand the desire to implement a deferred rotation system. However, we feel the deferred rotation system shown in the scoping document will not work for several reasons. First, by incorporating the cattle into one herd, we feel there are not enough existing developed water structures to support the capacity, especially in the Tobin Pasture. One solution would be to develop additional water sources, which can be time consuming and expensive for the Forest service. Another solution would be to haul water and dump into strategically placed troughs. With the lack of water this past grazing season, we had to invest in a water truck to haul water necessary for the livestock with the Halfway and Tobin Cabin pastures. This addition duty was both expensive and time consuming on us. We strongly feel the option of the permittee hauling water on a yearly basis in order to implement the proposed rotation system is not a viable option. Second, economically the ranch would have to hire additional skilled riders to ensure the cattle remained within the designated areas. Skilled riders within the local area are very difficulty to find and retain. Third, with the proposed pasture rotation every 30 days, moving the cattle constantly over this vast allotment greatly decreases the weight gain on the calves. The overall health of the herd will also be reduced because they will be forced to travel in large groups on dusty trails, which increasing the opportunity for pneumonia and pink eye.

For these reasons mentioned above, we would like you to take into consideration the rotations systems discussed below. We propose a two herd rotation system with the current permitted 419 cow/calf pairs. We would like to stress the cow/calf pairs for the Jack Creek/Jamison herd have not been determined yet and will be in addition to the already permitted 419 cow/calf pairs. At this time, we would like to see the Lower Jack Creek area (currently within the sheep allotment) incorporated into a deferred rotation system for the Tobin Cabin herd. Exact location and boundary to be determined, but the general vicinity is the Jamison Place south to the junction of Forest Road 83 and 8827 (staying east of Jackie's Thicket), then east to the Bear Butte block. Currently, the sheep permittees have not utilized this portion of forest lands for approximately 10 year and we see it as a viable alternative to reduce grazing impacts on the current allotment. The tables below show our proposed grazing rotation system.

**Iverson Management Limited Partnership
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Table 1. Proposed Livestock Grazing Levels and Seasons

Pasture/Unit	Permit Type	Max. # of Permitted Cattle (Cow/Calf Pairs)	Grazing Season
Halfway Pasture	Term	163	May 15 – June 15
North Willow Pasture	Term	256	June 1 – June 30
Antelope Flat 1 ²	Term	163	June 15 – June 20
Antelope Flat 1 ²	Term	265	July 1 – July 15
Antelope Flat 2 ²	Term	50	May 20 – June 15
Antelope Flat 3 & 4 ³	Term	250	Sept. 15 – Oct. 15
Tobin Cabin Pasture	Term/Private	163	June 15 – Sept. 15
Chemult Pasture	Term/Private	419	July 1 – Sept. 30
Chemult Pasture (Lower Jack Creek)	Term/Private	163	June 15 – Sept. 30
Dry Meadow Unit	Term	20	To be incorporated with the rotation of the Chemult Pasture
Squirrel Camp Unit	Term	40	To be incorporated with the rotation of the Chemult Pasture
Rider's Camp Unit	Term	50	To be incorporated with the rotation of the Chemult Pasture
Cannon Well Unit	Term	40	To be incorporated with the rotation of the Chemult Pasture
Jack Creek/Jamison Pasture ¹	Term/Private	Capacity yet to be evaluated	June 15 – Sept. 30
Round Meadow Pasture	Term	Capacity yet to be evaluated	To be incorporated with the rotation of the Chemult Pasture

¹ Jack Creek/Jamison Pasture capacity had not been evaluated. Once evaluated, the cow/calf pairs permitted will be in addition to the overall 419 cow/calf pairs.

² Antelope Pastures 1 & 2 will only be used for collecting cattle while moving out of Halfway and North Willow Pastures during grazing season. Antelope 1 & 2 will be alternated every other year.

³ Antelope 3 & 4 would only be used for holding while collecting cattle at the end of the season.

Table 2: Proposed livestock grazing pasture three-year rotation schedule, Tobin Cabin Herd (163 Cow/Calf Pairs)

	May 15 – June 15	June 15 – July 30	Aug. 1 – Sept. 30
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Year 1	Halfway Pasture, Collection into Antelope 1 or 2	Tobin Pasture	Chemult Pasture (north end)
Year 2	Halfway Pasture, Collection into Antelope 1 or 2	Tobin Pasture	Chemult Pasture (Lower Jack Creek)
Year 3	Halfway Pasture, Collection into Antelope 1 or 2	Chemult Pasture (Lower Jack Creek)	Chemult Pasture (south end)

Table 2: Proposed livestock grazing pasture three-year rotation schedule, Chemult Herd (256 Cow/Calf Pairs)

	June 1 – June 30	July 1 – Aug 15	Aug 16 – Sept. 30
Year 1	North Willow Pasture, Collection into Antelope 1 or 2	Chemult Pasture (south end)	Chemult Pasture (north end)
Year 2	North Willow Pasture, Collection into Antelope 1 or 2	Chemult Pasture (north end)	Chemult Pasture (south end)
Year 3	North Willow Pasture, Collection into Antelope 1 or 2	Chemult Pasture (south end)	Chemult Pasture (north end)

Table 2: Proposed livestock grazing pasture two-year rotation schedule, Jack Creek/Jamison Herd (To Be Determined Cow/Calf Pairs)

	June 15 – July 21¹	July 21 – Aug 28¹	Aug 28 – Sept. 30¹
Year 1	Lower Jamison (private)	Upper Jamison (private)	Jack Creek (Forest Service)
Year 2	Lower Jamison (private)	Jack Creek (Forest Service)	Upper Jamison (private)

¹ Actual on/off dates or dates identified for movement between pastures would vary annually based on forage conditions, climate conditions, or resource conditions within the overall allotment and individual pastures.

We would like to have input on which roads are permitted for permit administration and required allotment maintenance as stated under *Permitted Motorized Access*.

As stated in the *Adaptive Management* and *Implementation & Monitoring* sections, we understand that alternatives may be implemented on a year to year basis for the protection of sensitive resources. Also, local climate and weather could restrict the rotation between pastures and would be identified accordingly in the annual operating plan.

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**Iverson Management Limited Partnership
P.O. Box 97
Silver Lake, OR 97638**

Sincerely,

Keith Little, Permit Representative

cc: Dave Sabo, Chemult District Ranger
Mike Nevill, Forest Range Management Specialists

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**Iverson Management Limited Partnership
P.O. Box 97
Silver Lake, OR 97638**

RECEIVED
JAN 17 2014

January 17, 2014

Mr. Tracy Beck
1301 So. "G" Street
Lakeview, OR 97630

BY: *Carl P. Hylleberg*
HAND DELIVERED

Dear Mr. Beck,

This letter is in response to the Antelope Grazing Allotments Project Proposal & Public Scoping Document. In order to maintain our operations at the current level, Iverson Management Limited Partnership must continue to graze the Antelope Allotments. Without these allotments, the business would be forced to down size, resulting in a decrease to the local employment and local economy.

I support Alternative 3 with the understanding that all new construction is a shared cost between Iverson Management Limited Partnership and the US Forest Service. Also that Iverson Management Limited Partnership not be responsible for the reconstruction costs of the existing exclosures in and around the Squirrel Camp, Dry Meadow, Riders Camp, Cannon Well and Round Meadow. Since these structures may not meet the Forest Service structural standards we will not assume the maintenance responsibility until they have been repaired to the appropriate standard. The Forest service should be required to maintain all of the structural improvements currently not available to livestock grazing under alternative three: Sproats Meadow, Johnson Meadow, and Wilshire Meadow.

Dry Meadow: Within the Dry Meadow exclosure, a natural spring exists. However, the size of the exclosure appears to extreme in size. In my opinion, the fence materials will deteriorate to the point where the fence becomes ineffective within the time frame of this AMP. Instead of rebuilding the fence in its current location, we would like to request a new look be taken at the size of the exclosure so only the sensitive resources are excluded. As for the water development that exists at Dry Meadow, we agree with former Range Management Specialist Mike Nevil, that there should be a second tank installed in coordination with the first tank system to increase water storage for this area. I would like to recommendation to tie an existing second spring box in with the existing system to increase the supply of water available for livestock consumption, as discussed with Mike.

Rider's Camp: Within the Rider's Camp exclosure, the only water is ground water within natural ponds (no natural springs exist). To my knowledge, no sensitive resources have been identified within this exclosure. Like Dry Meadow, the fence will become ineffective within the

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time frame of this AMP. Before the fence is reconstructed, we would like to request all specialists take a look at this area to see if the fence is necessary for protection of sensitive resources. We strongly feel this fence can be removed and the area incorporated into the grazing strategy for the surrounding area. As for the water sources, the natural ponds could be protected by hard-facing the access points used by the cattle (crushed rock, etc.). This recommendation was made by Desi Zamudio, previous Forest Soils Specialist, before the enclosure was constructed.

Cannon Well: Within the Cannon Well enclosure, the only water is ground water from man-created ponds (no natural springs exist). These ponds were dug when the land was privately owned. To our knowledge, there are no sensitive resources within this area. Management of this area can be utilized without a fence in our propose grazing rotation described below. From an economic standpoint, removing the Cannon Well fence would serve two purposes. One, the cost to the Forest Service for maintaining the fence would be eliminated. Second, the materials could be utilized in the proposed fence reconstruction or new fence construction to the east.

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Round Meadow: Based on discussions and reports from various specialists, we believe Round Meadow should not be a separate pasture for the following reasons. First, the fence around Round Meadow will becomes ineffective within the time frame of this AMP. Before grazing can occur within Round Meadow, there would be enclosures put up around the springs, fens, and possible the cabin for cultural resource protection. With our proposed grazing strategy proposed below, we believe Round Meadow can be managed without an external fence, saving the Forest Service reconstruction expenses.

Jack Creek Riparian Pasture: After further conversations with specialists, we agree that Jack Creek can be grazed on a rotation system between our private lands (Jamison Place) and Forest Service lands. Since the capacity of the Jamison Place has never been included within the number of cow/calf pairs on the allotment, this pasture will be operated as a separate herd.

We feel by reducing and/or eliminated the enclosures of the six areas described above, we could begin to get back to achieving better overall utilization standards on the Antelope Cattle and Horse Allotment (Winema NF).

I support the use of the Jack Creek Oregon Spotted Frog Site Management Plan for management of the Jack Creek area. I feel that this is the best approach in managing the Oregon Spotted Frog habitat within the Antelope grazing allotment.

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**Iverson Management Limited Partnership
P.O. Box 97
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As part of the Iverson Management Limited Partnership efforts to work cooperatively with the Forest Service in managing the Oregon Spotted frog habitat within the Jack Creek are, we have agreed to put the Jamison Ranch properties under a Term Private Land grazing permit.

Sproats, Wilshire, and Johnson's Meadow: Our primary concern with these exclosures is the fences that will become ineffective within the time frame of this AMP. Instead of rebuilding the fence in its current location, we would like to request a new look be taken at the size of the exclosure so only the sensitive resources are excluded. At the period in time a new fence construction/reconstruction occurs, we request to be involved in the process to better facilitate livestock management. As previously stated in the Dry Meadow section above, additional storage tanks and storage boxes need to be incorporated into these three systems.

In the ***Fence Construction*** Section, we request fences are constructed/reconstructed to a standard and use low-maintenance materials (i.e. railroad ties for braces instead of treated lodgepole pine posts). Also no metal stays be put on the newly constructed/reconstructed fences because snow load and blow down damage the stays making maintenance of the fences more time consuming and costly.

As discussed in the ***Water Structures*** section, we agree there are many water structures that need improved and well as development of new water sources for better livestock dispersal. Throughout the EA process, we would like to meet with the IDT to discuss the plan for each water source in detail.

We would like to have input on which roads are permitted for permit administration and required allotment maintenance as stated under ***Permitted Motorized Access***. Iverson Management Limited Partnership supports the closure of Forest Roads 8821-9010 and Forest Road 8821-1260.

As stated in the ***Adaptive Management*** and ***Implementation & Monitoring*** sections, we understand that alternatives may be implemented on a year to year basis for the protection of sensitive resources. Also, local climate and weather could restrict the rotation between pastures and would be identified accordingly in the annual operating plan.

ZL

BH

**Iverson Management Limited Partnership
P.O. Box 97
Silver Lake, OR 97638**

Sincerely,



Keith Little, Permit Representative

cc: Lorene Guffey, Winter Rim Zone District Ranger
Mike Lawrence, Chemult District Ranger
Lucas Phillips, Forest Range Management Specialists